



Sound Policy. Quality Care.

October 30, 2017

The Honorable Hank Vaupel
Chair, House Health Policy Committee
Michigan House of Representatives
P.O. Box 30014
Lansing, MI 48909-7514

The Honorable Mike Shirkey
Chair, Senate Health Policy
Michigan State Senate
P.O. Box 30036
Lansing, MI 48909-7536

The Honorable John Bizon, M.D.
Michigan House of Representatives
P.O. Box 30014
Lansing, MI 48909-7514

RE: Substitute for House Bill No. 4472 – dispensing of interchangeable biosimilars

Dear Chairman Vaupel, Chairman Shirkey, and Representative Bizon:

The Alliance of Specialty Medicine (Alliance) is a coalition of national medical specialty societies representing more than 100,000 physicians and surgeons. We are dedicated to the development of sound health care policy that fosters patient access to the highest quality specialty care. The undersigned member organizations of the Alliance of Specialty Medicine write to express our support of the substitute for House Bill 4472 regarding the dispensing of interchangeable biosimilar products and appreciate that the substitute under consideration includes provisions ensuring timely communication between a pharmacist and prescriber are included.

The Alliance has closely followed the development of federal and state policy related to biosimilars and the safety considerations that should be taken into account as more biosimilar versions of existing biologic medicines become a new treatment option for our patients. The Alliance supports the notification language included in the substitute for H.B. 4472 (p. 5, line 19 – p. 6, line 18) providing that substitution of an interchangeable biological drug product is communicated to the prescriber within five days after dispensing.

The practice of automatic substitution that is seen with generic drugs is not entirely appropriate for biosimilar products given that they are not simply “generic” versions of biologics. Physicians

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American Academy of Facial Plastic and Reconstructive Surgery • American Association of Neurological Surgeons
American College of Mohs Surgery • American College of Osteopathic Surgeons • American Gastroenterological Association
American Society for Dermatologic Surgery Association • American Society of Cataract & Refractive Surgery • American Society of Echocardiography
American Society of Plastic Surgeons • American Urological Association • Coalition of State Rheumatology Organizations
Congress of Neurological Surgeons • National Association of Spine Specialists

need to know what medicine their patient receives and therefore, the prescribing physician should be notified whenever a patient's biologic medicine is substituted. This will help to ensure the accuracy of patient medical records and identify any issues should there be an adverse event.

Advances in medical treatment have transformed the way we fight certain diseases. Biologics, and biosimilars, will continue to be an important treatment option for patients.

Thank you for your attention to this important issue.

Sincerely,

American Academy of Facial Plastic & Reconstructive Surgery
American Association of Neurological Surgeons
American College of Mohs Surgery
American Gastroenterological Association
American Society of Cataract and Refractive Surgery
American Society of Echocardiography
American Society of Plastic Surgeons
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